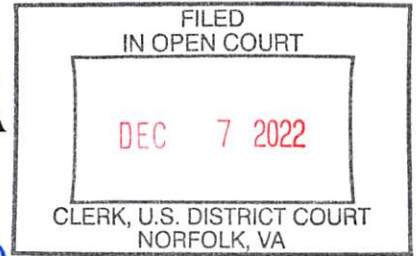


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**



UNITED STATES OF AMERICA,) **FILED UNDER SEAL**
) Criminal No. 2:22-cr-149
)
 v.)
) 18 U.S.C. § 2252(a)(2)
 DANGELO MCNAUGHTON,) Receipt of Child Pornography
) (Count 1)
 Defendant.)
) 18 U.S.C. § 2252(a)(4)(B)
) Possession of Child Pornography
) (Count 2)
)
) 18 U.S.C. § 2253
) Criminal Forfeiture

INDICTMENT

December 2022 Term – at Norfolk

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Receipt of Child Pornography)

From on or about April 2022, through on or about June 2022, within the Eastern District of Virginia, and elsewhere, the defendant, DANGELO MCNAUGHTON, knowingly received a visual depiction using a means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

(In violation of Title 18, United States Code, Section 2252(a)(2).)

COUNT TWO
(Possession of Child Pornography)

On or about July 14, 2022, in Norfolk, within the Eastern District of Virginia, the defendant, DANGELO MCNAUGHTON, did knowingly possess at least one matter, that is a Samsung Android phone, which was manufactured outside of Virginia, which contains a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and was produced using materials which had been mailed and shipped and transported using a means and facility of interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and at least one visual depiction involved a prepubescent minor and a minor who had not attained 12 years of age.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B).)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendant, DANGELO MCNAUGHTON, is hereby notified:

A. Upon conviction of either of the violations alleged in Counts One or Two of this Indictment, the defendant shall forfeit to the United States:

1. Any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

2. Any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property;

3. Any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*

B. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 2253; and Title 21, United States Code, Section 853(p).)

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

United States v. DANGELO MCNAUGHTON
Criminal No. 2:22cr149

A TRUE BILL

REDACTED COPY

FOREPERSON

JESSICA D. ABER
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